

UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF NEW YORK

TARGET CORP., *et al.*,

Plaintiffs,

v.

VISA INC., *et al.*,

Defendants.

Case No. 13-cv-3477 (AKH)

*Motion to seal
granted
6.4.25
Alvin Hellerstein*

7-ELEVEN, INC., *et al.*,

Plaintiffs,

v.

VISA INC., *et al.*,

Defendants.

Case No. 13-cv-4442 (AKH)

**NOTICE OF MOTION FOR LEAVE TO FILE UNDER SEAL
NETWORK DEFENDANTS' REPLY IN FURTHER SUPPORT OF THEIR MOTION
FOR REVISED ORDER REGULATING PROCEEDINGS PROVIDING FOR
SEPARATE TRIALS OR IN THE ALTERNATIVE, TO PRECLUDE UNDISCLOSED
EXPERT TESTIMONY UNDER FEDERAL RULE OF CIVIL PROCEDURE 37**

PLEASE TAKE NOTICE THAT, pursuant to Rule 4(B)(i) of this Court's Individual Rules, the Network Defendants respectfully move this Court, before the Honorable Alvin K. Hellerstein, United States District Judge, in Courtroom 14D of the Daniel Patrick Moynihan United States Courthouse, located at 500 Pearl Street, New York, New York 10007, at a date and time to be determined by the Court, for leave to file under seal an unredacted version of the Network Defendants' Reply in Further Support of Their Motion for a Revised Order Regulating Proceedings Providing for Separate Trials or in the Alternative, to Preclude Undisclosed Expert Testimony

Under Federal Rule of Civil Procedure 37 (the "Reply Brief"). Accordingly, pursuant to Rule 4(B)(i) of this Court's Individual Rules, the Network Defendants are contemporaneously herewith (i) filing on ECF a partially redacted copy of the Reply Brief; (ii) submitting an unredacted copy of the same to the Court; and (iii) serving upon Plaintiffs in the above-captioned actions unredacted copies of the same.

The grounds for this motion are set forth in the accompanying memorandum of law.

Dated: June 2, 2025

Respectfully submitted,

HOLWELL, SHUSTER & GOLDBERG LLP

By: /s/ Michael S. Shuster

Michael S. Shuster
Demian A. Ordway
Benjamin F. Heidlage
Gregory J. Dubinsky
425 Lexington Avenue
New York, NY 10017
(646) 837-5151
mshuster@hsgllp.com
dordway@hsgllp.com
bheidlage@hsgllp.com
gdubinsky@hsgllp.com

**ARNOLD & PORTER KAYE SCHOLER
LLP**

Robert J. Vizas
Three Embarcadero Center, 10th Floor
San Francisco, CA 94111-4024
(415) 471-3100
robert.vizas@arnoldporter.com

Anne P. Davis
Matthew A. Eisenstein
Rosemary Szanyi
601 Massachusetts Avenue, NW
Washington, D.C. 20001-3743
(202) 942-5000

anne.davis@arnoldporter.com
matthew.eisenstein@arnoldporter.com
rosemary.szanyi@arnoldporter.com

*Counsel for Defendants Visa Inc., Visa U.S.A.
Inc., and Visa International Service Association*

**PAUL, WEISS, RIFKIND, WHARTON &
GARRISON LLP**

By: /s/ Kenneth A. Gallo
Kenneth A. Gallo
Donna M. Ioffredo
Lisa Danzig
2001 K Street, NW
Washington, D.C. 20006-1047
Tel.: (202) 223-7300
Fax: (202) 223-7420
kgallo@paulweiss.com
dioffredo@paulweiss.com
ldanzig@paulweiss.com

Brette Tannenbaum
Nina Kovalenko
1285 Avenue of the Americas
New York, NY 10019-6064
Tel.: (212) 373-3000
Fax: (212) 757-3990
btannenbaum@paulweiss.com
nkovalenko@paulweiss.com

*Counsel for Defendants Mastercard
Incorporated and Mastercard International
Incorporated*